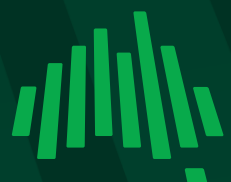


Request for Information for Australian Bushland Program Strategic Property Purchases

December 2025



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



12 December 2025

Australian Bushland Program
Department of Climate Change, Energy, the Environment and Water
Canberra ACT 2601
Australia

Via Email: australianbushlandprogram@dcceew.gov.au

RE: Request for Information for Australian Bushland Program Strategic Property Purchases

Dear Contact Officer,

Executive Summary

The National Farmers' Federation (**NFF**) welcomes the opportunity to respond to this Request for Information (**RFI**) outlined on the Australian Government Tenders Portal regarding the proposed Strategic Property Purchasing Program under the *Australian Bushland Program*.

The proposed strategic property purchases program is intended to contribute toward the Commonwealth's commitment to protect and conserve 30% of Australia's landmass and marine areas by 2030 under the *Kunming-Montreal Global Biodiversity Framework*. Under the proposal, purchasing partners will be able to identify and nominate strategic land acquisitions to the *Department of Climate Change, Energy, the Environment and Water* (**Department**) for assessment against the 30% target for land. Properties approved under the program would be subject to perpetual management obligations, implemented through an approved Management Plan, to ensure that biodiversity values are maintained or enhanced over time. Critically, the Commonwealth would neither assume ownership of participating properties nor fund their long-term management. It is this combination of partial public funding, perpetual private-sector obligations, and the absence of ongoing Commonwealth support that underpins many of the NFF's concerns.

NFF understands that there is an approximate shortfall of 5.31% under the 30% target for land. Progress must not come at the expense of agricultural land. This principle is already reflected in Commonwealth policy, including Strategic Objective Two of the *Agriculture and Land Sector Plan*¹. We also note that the former *Minister for the Environment and Water*, the Hon. Tanya Plibersek MP, expressly affirmed this position as articulated in the following remarks to Beef Central: "*Currently we have 22pc of our land protected, with plans in place to get to close to 27pc. None of this involves agricultural land*"².

This commitment must be embedded across all elements of the program's design and implementation to ensure agricultural land is not displaced or adversely affected.

¹ September 2025, Commonwealth of Australia, Department of Agriculture, Fisheries and Forestry: [Agriculture and Land Sector Plan](#)

² July 2022, Beef Central: [Concerns raised over Plibersek's plan to "lock up" land](#)

Informing Design Process and Providing Clarity

NFF understands that the proposal remains at the RFI stage and that subject to market interest, a subsequent procurement process may be developed at which point further policy detail and implementation guidance would be provided. Notwithstanding this initial stage, NFF raises the following concerns and key questions to help shape the strategic purchasing component and guide future policy development:

Perpetual Management Obligation

NFF supports the requirement for strict, permanent management obligations to apply to land purchased under the program to ensure biodiversity outcomes are safeguarded and do not deteriorate over time. Poorly managed or neglected land can heighten bushfire risks and/or create 'safe harbours' for invasive species that threaten neighbouring agricultural production. This risk is explicitly recognised under Outcome 4 of the *Implementing Australia's Strategy for 2024-2030* document, which the Department is developing in close consultation with industry groups. As the NFF has previously stated in submissions on this matter, robust management obligations must be a condition of any Commonwealth funding provided through the *Australian Bushland Program*.

Future policy design must also consider strong compliance and enforcement settings to ensure that management obligations are achieved and to avoid perverse environmental or agricultural consequences. Clear and practical mechanisms must exist for neighbouring landholders to raise concerns where management obligations are not being met, and on-ground impacts are evident. Given the perpetual nature of these obligations, program design must also address scenarios in which landholding entities become insolvent, change ownership, or otherwise cease operations, ensuring continuity of management responsibilities and safeguarding long-term biodiversity outcomes.

Nomination Process for Strategic Purchasing

NFF seeks clarification as to whether properties nominated for purchase must first be consented to by the private landholder, or whether interested third parties may nominate land without prior owner agreement or engagement.

Nature of Strategic Land Purchasing

The RFI documentation states that while purchases are intended to focus on under-represented bioregions (i.e., *Interim Biogeographic Regionalisation for Australia*), the Department will retain discretion to approve purchases outside these regions. NFF seeks clarity on how this discretion would operate, particularly given that the formal selection criteria have not yet been developed.

Government Purchasing Contributions

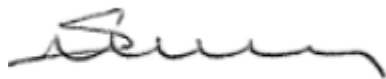
It is proposed that the Department will contribute upward of 33% toward a purchase (value determined independently) through funding arrangements under the *Australian Bushland Program* provided in the 2025-26 Federal Budget. NFF holds concerns regarding how the independent valuation process framework will be applied as there is a material

risk that natural capital assets may not be appropriately recognised, leading to the undervaluation of land offered by interested private parties.

Conclusion

NFF remains committed to working constructively with the Commonwealth and Governments to achieve genuine and durable biodiversity outcomes. We look forward to continued engagement on further design and consultation as policy settings are developed. Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au at the first instance to progress this discussion.

Yours sincerely,



SU MCCLUSKEY

Interim Chief Executive



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Leading
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